

1700 Diagonal Road | Suite 500 | Alexandria, VA 22314

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street SW Washington, D.C. 20554

November 15, 2018

Re: In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications, Docket No. 04-35

New Part 4 of the Commission's Rules Concerning Disruptions to Communications, Docket No. 15-80

Dear Ms. Dortch:

On November 13, 2018, Daniel Henry, NENA Director of Government Affairs, along with NENA Director of Technical Issues Roger Hixson and NENA CEO Brian Fontes met via telephone with members of the Commission's Public Safety and Homeland Security Bureau concerning 9-1-1's access to real-time outage data from the Commission's Network Outage Reporting System (NORS) and Disaster Information Reporting System (DIRS). Present from the Commission were Brenda Villanueva, James Wiley, and Tiffany Wong.

During the meeting, NENA stated that real-time access to the outage data reported in NORS and DIRS would be helpful to maintaining quality 9-1-1 service, but that the minutiae contained in these reports (e.g., the precise locations and specific equipment affected) may not be necessary for 9-1-1's purposes. Recognizing the importance of actionable data in the busy PSAPs environment, NENA stated that a summary of the functional outcomes of network outages (e.g., a visual representation of the area impacted) would be more appropriate than the numerous jargon-laden reports submitted by carriers to the Commission. These simplified outputs may also help assuage carrier concerns regarding the confidentiality and security of network equipment information. Finally, NENA noted that ongoing improvements to the near-real time, direct-to-PSAP outage reports required of carriers will aid in making network outages more easily understood and may potentially lessen the need for PSAP access to NORS.

Should you have any further questions, please feel free to contact NENA.

Daniel Henry

Sincerely,

Director of Government Affairs

CC: Ms. Brenda Villanueva, Public Safety and Homeland Security Bureau Mr. James Wiley, Public Safety and Homeland Security Bureau Ms. Tiffany Wong, Public Safety and Homeland Security Bureau

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